

SANDRA DUNNING; May 19, 2010

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

PATTY BEALL, MATTHEW MAXWELL,)
TALINA McELHANY and KELLY)
HAMPTON, individually and on)
behalf of all other similarly) 2:08-cv-422 TJW
situated,)
Plaintiff(s),)
vs.)
TYLER TECHNOLOGIES, INC., and)
EDP ENTERPRISES, INC.,)
Defendant(s).)

DEPOSITION UPON ORAL EXAMINATION OF
SANDRA DUNNING

5:19 P.M.

MAY 19, 2010

520 PIKE STREET, 12TH FLOOR

SEATTLE, WASHINGTON



REPORTED BY: MARY L. GREEN, CCR 2981

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A P P E A R A N C E S

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<p>1 identification.)</p> <p>2 Q. (BY MS. PERLIONI) I'm going to hand you a</p> <p>3 document that I marked Deposition Exhibit 5. Can you</p> <p>4 take a look at that exhibit and tell me if you</p> <p>5 recognize it?</p> <p>6 A. That was the resume I gave to them.</p> <p>7 Q. When you say --</p> <p>8 A. To Tyler.</p> <p>9 Q. So Deposition Exhibit 5, does it appear to be</p> <p>10 a true and correct copy of the resume you submitted to</p> <p>11 Tyler Technologies when seeking employment?</p> <p>12 A. Yes.</p> <p>13 Q. And sitting here today looking at it, does the</p> <p>14 information you've included on Deposition Exhibit 5 --</p> <p>15 is it all true and accurate?</p> <p>16 A. Yes.</p> <p>17 (Deposition Exhibit 6 was marked for</p> <p>18 identification.)</p> <p>19 Q. (BY MS. PERLIONI) I'm going to hand you</p> <p>20 another document. This one I'm marking as Deposition</p> <p>21 Exhibit 6, and I would like you to take a look at</p> <p>22 Deposition Exhibit 6 and tell me if you recognize it.</p> <p>23 A. Yes, I do.</p> <p>24 Q. For the record, what is Deposition Exhibit 6?</p> <p>25 A. That was my employment application with Tyler.</p>	<p>1 A. Yes.</p> <p>2 Q. So as I understand it, you graduated from high</p> <p>3 school?</p> <p>4 A. Uh-huh.</p> <p>5 Q. And then went to the University of Cincinnati?</p> <p>6 A. Uh-huh. Yes.</p> <p>7 Q. And what was your major while you were at the</p> <p>8 University of Cincinnati?</p> <p>9 A. Well, I only had an Associate's degree, so it</p> <p>10 was in business.</p> <p>11 Q. So you actually graduated with the Associate's</p> <p>12 degree?</p> <p>13 A. Yes.</p> <p>14 Q. Have you gone back or had any additional</p> <p>15 schooling since graduating with your Associate's degree</p> <p>16 from the University of Cincinnati?</p> <p>17 A. I have not.</p> <p>18 Q. And do you have any certifications?</p> <p>19 A. No.</p> <p>20 (Deposition Exhibit 7 was marked for</p> <p>21 identification.)</p> <p>22 Q. (BY MS. PERLIONI) I'm going to hand you</p> <p>23 another document. This one I'm marking Deposition</p> <p>24 Exhibit 7, and I'd like you to take a look at</p> <p>25 Deposition Exhibit 7 and tell me if you recognize it.</p>
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<p>1 Q. I'd like to refer you to some numbers on the</p> <p>2 bottom right-hand corner of the -- do you see those</p> <p>3 down there on the exhibit where it says Tyler/Beall and</p> <p>4 there's some numbers following?</p> <p>5 A. Yes.</p> <p>6 Q. Just so you understand, those are Bates</p> <p>7 numbers that we use to identify pages, so at times if</p> <p>8 I'm asking you about an exhibit, I may say it's number</p> <p>9 1273. Those are the numbers I'm referring to, okay?</p> <p>10 A. Yes.</p> <p>11 Q. So looking at Deposition Exhibit 6, if you</p> <p>12 look at the second page, which is 1274, there's a</p> <p>13 signature there. Is that your signature?</p> <p>14 A. Yes, it is.</p> <p>15 Q. So you signed and dated the application for</p> <p>16 employment on June 19, 2005?</p> <p>17 A. Correct.</p> <p>18 Q. And, again, sitting here today looking back</p> <p>19 through it, do you believe all the information that you</p> <p>20 provided to Tyler Technologies in seeking employment is</p> <p>21 true and correct?</p> <p>22 A. Yes.</p> <p>23 Q. I want to look at again the second page of</p> <p>24 Deposition Exhibit 6, and it has your educational</p> <p>25 background listed.</p>	<p>1 A. (Reviewing). Yes.</p> <p>2 Q. For the record, what is Deposition Exhibit 7?</p> <p>3 A. It's their acceptance of my hire as I</p> <p>4 understand.</p> <p>5 Q. So it was a letter offering you employment</p> <p>6 with Tyler Technologies?</p> <p>7 A. Yes.</p> <p>8 Q. If you look in the first paragraph of</p> <p>9 Deposition Exhibit 7, it states in there that your</p> <p>10 salary expressed on an annual basis will be \$44,000 per</p> <p>11 year of work. Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. What was your understanding of that -- of what</p> <p>14 your salary was intended to cover? Were you salaried?</p> <p>15 Were you going to get any additional pay, or was that</p> <p>16 your full base pay?</p> <p>17 A. That was my full base pay.</p> <p>18 Q. Was it your understanding that you would</p> <p>19 receive 44,000 per year regardless of the amount of</p> <p>20 hours that you would be working?</p> <p>21 A. Well, they never -- I assumed a 40-hour week,</p> <p>22 and if there was a little overtime, a couple hours here</p> <p>23 or there, that didn't matter to me, but they never</p> <p>24 explained the travel involved and that I would be</p> <p>25 leaving on a Sunday night and/or coming home at 1 a.m.</p>

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<p>1 Saturday morning, so I would leave a client's site on 2 Friday night and be unable to get home until 1 a.m. in 3 the morning. 4 MS. PERLIONI: I'm going to object to 5 the answer as nonresponsive. 6 Q. (BY MS. PERLIONI) What made you assume that 7 you would only be working a 40-hour week? 8 A. Because that's the way I had worked in the 9 past. 10 Q. So when you were initially employed with Tyler 11 Technologies, did you ask anyone whether you would be 12 working a 40-hour week? 13 A. No. 14 Q. Let's back up real quick, and I want to 15 understand the sequence of events from the time that 16 you initially submitted your application for employment 17 and who you spoke with along the way. 18 A. Okay. 19 Q. So let's start with you submitted the 20 application that we have marked -- I'm sorry. You 21 submitted, I would assume, your resume that's marked 22 Deposition Exhibit 5? 23 A. Uh-huh. 24 Q. And what prompted you to submit your resume to 25 Tyler Technologies?</p>	<p>1 understand how to use their system after having been on 2 one for a good number of years. 3 Q. What do you mean by after having been on one 4 for a good number of years? 5 A. Well, typically the sites that Munis went into 6 were sites where the clients had been on a governmental 7 accounting system, some of them 15, 20 years. They 8 didn't know anything other than their own system. 9 Q. When you were the client going through the 10 implementation, how many of your co-workers were being 11 trained at the same time? 12 A. It was the finance department, so we had 13 accounts receivable, accounts payable, payroll, and we 14 were -- our site really didn't want to go through a 15 conversion. It was one of those. 16 They just picked out the basic minimum modules 17 that they wanted to use, and to me that was kind of 18 discouraging, because the Munis product seemed to be a 19 pretty good one and why not use it, and that was 20 another reason I wanted to get out there and do more. 21 Q. So you were in the finance department for did 22 you say Metro Parks Tacoma? 23 A. Correct. 24 Q. And what type of -- I mean, is that -- I'm not 25 from here. Is it city? County?</p>
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<p>1 A. I was working at Metro Parks Tacoma. They 2 went on the Munis system, and I met Gail Reams-Cohen. 3 I met Laurie Berger. I met a man named Alex. I can't 4 recall his last name right now. 5 So during that implementation period, I knew 6 those people from being there and working with them 7 on-site, and one day I went to lunch with Laurie Berger 8 and I just said, I would like to do what you do. I 9 would like to go out and teach people how to use the 10 system. And she said, We have openings. Give me your 11 information, and that's what I did. 12 Q. So take me back. You were actually a user who 13 is learning from a team who has come in to do an 14 implementation; is that right? 15 A. Yes. 16 Q. Can you walk me through your experience as 17 being a customer going through an implementation? 18 A. Well, most people in government have been on 19 their systems for a good number of years, say 20 years, 20 and the idea of change is very difficult for them. I 21 had been employed for 25 years with another company, 22 saw government as stagnant and change as welcome, so I 23 was the odd one. 24 That's why after I saw the Munis team I wanted 25 to do that job. I thought I could help other people</p>	<p>1 A. It's the only governmental entity in 2 Washington state of its kind, so it's a very unique 3 government facility. 4 Q. What type of entity? 5 A. Parks. Parks and recreation. 6 Q. And it had purchased the certain modules? 7 A. Uh-huh. 8 Q. You mentioned accounts receivable, accounts 9 payable, payroll. 10 A. General ledger. 11 Q. Any others that you recall? 12 A. Fixed assets and purchase orders. 13 Q. Was it your peers within the finance 14 department who were not necessarily receptive to -- 15 A. Correct. 16 Q. Was it beyond that or are those just the ones 17 that you know about? 18 A. Those are the ones I know about. 19 Q. And approximately how many peers were you 20 referring to? 21 A. Well, there was one person for each of those 22 areas, so there was one or two people for accounts 23 receivable and general billing, there was one person 24 for general ledger, one person for payroll, one person 25 for fixed assets, and one person for accounts payable.</p>

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<p>1 in? Have you done this? Have you done that? That</p> <p>2 went on for a month. That was on my time. At 5:30 in</p> <p>3 the morning I'm up with Ferdy or some guy in some other</p> <p>4 country.</p> <p>5 Q. Ferdy, someone from Thailand?</p> <p>6 A. Ferdy Torres was in customer service. He's</p> <p>7 probably still there. He's really a good man. He's a</p> <p>8 kind, gentle person and amazingly knowledgeable as also</p> <p>9 is Mark Morrell.</p> <p>10 (Deposition Exhibit 9 was marked for</p> <p>11 identification.)</p> <p>12 (Recess taken.)</p> <p>13 Q. (BY MS. PERLIONI) Do you understand you're</p> <p>14 still under oath?</p> <p>15 A. Yes.</p> <p>16 Q. I would like to look at two of your calendars.</p> <p>17 I'm going to hand you Exhibit 1 and Exhibit 2, which is</p> <p>18 your 2006 and 2007 calendars, and I want to try to go</p> <p>19 through this and make it as quick as we can, but in</p> <p>20 flipping through your calendars -- and you were</p> <p>21 mentioning McKinney earlier.</p> <p>22 It just seemed like a good -- maybe looking</p> <p>23 through the calendars I could see multiple trips there</p> <p>24 where you had little acronyms, so I thought maybe that</p> <p>25 would be a good one we could walk through and you could</p>	<p>1 Q. That was your first initial meeting with</p> <p>2 McKinney?</p> <p>3 A. Yes.</p> <p>4 Q. What does that mean by work flow?</p> <p>5 A. Work flow was actually another word for</p> <p>6 business rules, so the electronic signature.</p> <p>7 Q. So looking the next week, is that -- for</p> <p>8 December 25, that HD, is that holiday?</p> <p>9 A. Yeah. Christmas.</p> <p>10 Q. Then the day after Christmas --</p> <p>11 A. 26th they gave me time at home to write the</p> <p>12 analysis, so I would have been at home writing the</p> <p>13 analysis from the week before, because when I was</p> <p>14 on-site, I used hand notes. I was writing, not like</p> <p>15 she is exactly, but I was writing.</p> <p>16 Then when I got home, what I had to do was do</p> <p>17 the screen shots of each of those areas from the</p> <p>18 system, and then in my laptop I would have to highlight</p> <p>19 the selections the client wanted. So it was not only a</p> <p>20 write-up. It was screen shots also.</p> <p>21 Q. So write-up and screen shots of the analysis</p> <p>22 from your prior --</p> <p>23 A. On the 26th, yeah.</p> <p>24 Q. When you worked at home, what were your</p> <p>25 typical hours from your home office?</p>
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<p>1 explain the acronyms. I notice it started in December</p> <p>2 or at least I think. That's the first one I see. If</p> <p>3 you look at December 18 of 2006.</p> <p>4 A. Yes.</p> <p>5 Q. Looking at December 18, it looks like -- you</p> <p>6 see where you have GL, BG, those letters?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Can you just describe for me or explain for me</p> <p>9 what you're doing?</p> <p>10 A. I opened up the entire menu for each one of</p> <p>11 those modules, and then analysis is the word over there</p> <p>12 under McKinney. I had to do a write-up with the client</p> <p>13 site based on what they wanted to do, so it's how they</p> <p>14 were going to use the Munis software and the selections</p> <p>15 they would like to make in each of those modules.</p> <p>16 So I had to do the demo and then write a</p> <p>17 report given what they had told me. That analysis was</p> <p>18 used for other implementers or myself or the project</p> <p>19 managers so that they knew the choices the client</p> <p>20 wanted to make.</p> <p>21 Q. Would that have been an initial meeting?</p> <p>22 A. No, because initially Gail or someone would</p> <p>23 have been there to talk to the client site, and then</p> <p>24 the analysis would have followed after the initial</p> <p>25 meeting.</p>	<p>1 A. Usually an 8-hour day. However, in the case</p> <p>2 of the laptop malfunction or help or perhaps Mark back</p> <p>3 in Maine would have a Webex for training, I would be up</p> <p>4 early or late, so the idea was an 8-hour day, but it</p> <p>5 wasn't often an 8-hour day.</p> <p>6 Q. Let's keep going through. That was in</p> <p>7 December of 2006.</p> <p>8 A. Uh-huh.</p> <p>9 Q. Go to 2007.</p> <p>10 A. Okay.</p> <p>11 Q. If I'm reading your calendar correctly, you</p> <p>12 went back to McKinney on January 9.</p> <p>13 A. Yes.</p> <p>14 Q. And can you explain what your notations mean</p> <p>15 relating to this trip to McKinney?</p> <p>16 A. Okay. I did analysis, so on Tuesday I did</p> <p>17 analysis for fixed assets. I made my notes. I showed</p> <p>18 the client the screen. Then on Wednesday, it was</p> <p>19 inventory and treasury management, and, again, I would</p> <p>20 have reviewed those screens, opened up the menu, showed</p> <p>21 the client, and asked them how they planned to use it.</p> <p>22 Then on Thursday, we did accounts receivable and</p> <p>23 general billing.</p> <p>24 Then on Friday, that accounts receivable</p> <p>25 general billing testing, that was something new that we</p>

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<p>1 started doing as implementers. We had a series of</p> <p>2 tests to run through each of the modules to make sure</p> <p>3 that the software was functioning as it should before</p> <p>4 we actually had the client use it, and that was a good</p> <p>5 thing to do, because sometimes things happened during</p> <p>6 those installs, and if you were there with the client</p> <p>7 and it happened, it wasn't a good thing.</p> <p>8 So then I would take a scenario and I would go</p> <p>9 right through and process an accounts receivable</p> <p>10 invoice, and then I would actually record payment on</p> <p>11 it, and it was simple, but it just proved that the</p> <p>12 software was working for all of those.</p> <p>13 Q. It looks like you next went to McKinney</p> <p>14 January 30?</p> <p>15 A. Well, I've got sick on that one, and, again,</p> <p>16 we'd have to look to my expense report, because I would</p> <p>17 have turned in sick days on my expense report.</p> <p>18 Q. You're right. I read that wrong.</p> <p>19 A. Yeah. I had the flu.</p> <p>20 Q. So go to February of 2007.</p> <p>21 A. Yup.</p> <p>22 Q. February 28, is that your next trip to</p> <p>23 McKinney?</p> <p>24 A. Correct.</p> <p>25 Q. What do your notes show that you were doing --</p>	<p>1 A. Oh, okay. There was an Excel spreadsheet, and</p> <p>2 they could either hand key into that sheet and then</p> <p>3 send that off to Munis and Munis would load it in the</p> <p>4 system so that later on when I went there for future</p> <p>5 training, their new chart of accounts if they had</p> <p>6 changed any of the codes was in the Munis system, and</p> <p>7 then we could train and go forward using those new</p> <p>8 account codes.</p> <p>9 Q. And were this he -- was that something that</p> <p>10 differed amongst clients?</p> <p>11 A. Yes. I mean, there are always going to be</p> <p>12 balance sheet accounts, revenue accounts, expense</p> <p>13 accounts, et cetera. That's basic to all accounting.</p> <p>14 But for each client, it will be somewhat different</p> <p>15 based on their needs.</p> <p>16 Q. How they record different --</p> <p>17 A. Correct.</p> <p>18 MS. BAGLEY: Object to the form.</p> <p>19 Q. (BY MS. PERLIONI) For someone like me having</p> <p>20 no accounting background -- and I'm sorry if I'm asking</p> <p>21 -- it's a foreign language to me.</p> <p>22 A. Now you know why I was out there with clients</p> <p>23 holding their hands.</p> <p>24 Q. Yes. Very much so. But it seems to me like</p> <p>25 your accounting background is just so important being</p>
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<p>1 A. That was actually client training, so that was</p> <p>2 the chart of accounts --</p> <p>3 Q. I'm sorry. What is the chart of accounts? I</p> <p>4 haven't heard that before.</p> <p>5 A. Okay. In accounting, you have a numbering</p> <p>6 scheme that tells what you're paying, what department</p> <p>7 it's charged to, and -- well, it gets more detailed,</p> <p>8 but generally it's a department and it's an account</p> <p>9 code that describes the items.</p> <p>10 So it could be a maintenance item. It could</p> <p>11 be a service. It could be advertising. Every client</p> <p>12 set up their own chart of accounts based on the needs</p> <p>13 of a school district, or with the governments, those</p> <p>14 were more flexible, but with the school districts, they</p> <p>15 reported to the state, so they had certain codes they</p> <p>16 had to use.</p> <p>17 Q. Were you finished with that?</p> <p>18 A. Yes.</p> <p>19 Q. So that's the chart of accounts?</p> <p>20 A. Chart of accounts.</p> <p>21 Q. Why is that listed on February 28?</p> <p>22 A. Why was it on February 28? Because my manager</p> <p>23 set that schedule for me to follow.</p> <p>24 Q. But what is it that you were doing with the</p> <p>25 client relating to their chart of accounts?</p>	<p>1 able to go through and work these kinds of issues and</p> <p>2 train your clients on these kind of issues --</p> <p>3 A. It definitely helped.</p> <p>4 MS. BAGLEY: Object to the form.</p> <p>5 Q. (BY MS. PERLIONI) So what is the JE?</p> <p>6 A. Journal entry.</p> <p>7 Q. What is it that you're working with the client</p> <p>8 relating to journal entry?</p> <p>9 A. Teaching them how to do a journal entry in a</p> <p>10 computer system. A lot of them didn't know how to do</p> <p>11 that, so we would bring up that screen and show them</p> <p>12 how to fill in the required areas or the areas that</p> <p>13 they wanted to use.</p> <p>14 Some areas were required. You had to make an</p> <p>15 entry. Some areas were additional showing them how to</p> <p>16 use that journal entry and post it so it would impact</p> <p>17 their general ledger.</p> <p>18 Q. And what about I assume that's miscellaneous?</p> <p>19 A. Oh, gosh. That was just anything else that</p> <p>20 didn't get caught up.</p> <p>21 Q. What about it looks like the 1st of March? Is</p> <p>22 that still at McKinney?</p> <p>23 A. Yes. That's still at McKinney, and I didn't</p> <p>24 draw my arrow through there. Requisitions, purchase</p> <p>25 orders, accounts payable, and then anything auxiliary</p>

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<p>1 to requisitions.</p> <p>2 Q. What is it that you're doing with the client</p> <p>3 on that date?</p> <p>4 A. Again, I'm bringing up the screens, and</p> <p>5 typically you started out with the core users, the</p> <p>6 managers, and you showed them how to use it, and then</p> <p>7 as they were learning it and absorbing it, you went on</p> <p>8 and trained what you call the end user, so the actual</p> <p>9 person who would be keying in.</p> <p>10 Q. And Friday, the 2nd of March?</p> <p>11 A. Yeah. That one I did bid analysis and I did</p> <p>12 testing on that day.</p> <p>13 Q. What does that entail?</p> <p>14 A. The bid analysis was showing them the bidding</p> <p>15 and the requisition screen and how to do that, because</p> <p>16 most sites didn't use an automated system. They used</p> <p>17 Excel sheets.</p> <p>18 Q. So this was something completely new?</p> <p>19 A. To some of the sites, yes. Actually, to most</p> <p>20 of them. Not too many of them wanted to use the bid</p> <p>21 module. That was the clunky one.</p> <p>22 Q. What did testing there refer to?</p> <p>23 A. I can't tell you --</p> <p>24 Q. So let's --</p> <p>25 A. -- exactly what I tested.</p>	<p>1 A. I forgot Friday was a half a day and had to</p> <p>2 reschedule my departure, so I had thought Friday was a</p> <p>3 full day, and I had to get back home.</p> <p>4 Q. So you left Thursday?</p> <p>5 A. No. Instead of staying a full day on Friday,</p> <p>6 I stayed a half a day on Friday and --</p> <p>7 Q. You mean a half a day on Thursday?</p> <p>8 A. No. I stayed all day Thursday. I forgot that</p> <p>9 Friday was only a half a day when I made my</p> <p>10 arrangements with Dube. I told Dube it was a full day,</p> <p>11 so then I had to call and get an earlier flight as I</p> <p>12 could out of there.</p> <p>13 Q. So when is your next trip to McKinney?</p> <p>14 Looking down March 26, is that a McKinney Webex?</p> <p>15 A. Webex. And that was where from home I could</p> <p>16 log onto their computer, and then I could show them</p> <p>17 modules or train with them from home, but, again, I had</p> <p>18 to have customer service report signed by the client</p> <p>19 that I did that training with them.</p> <p>20 Q. Do you know what kind of Webex you were doing</p> <p>21 for them?</p> <p>22 A. It would have been training on the system or</p> <p>23 testing, something like that, and I didn't write it on</p> <p>24 here.</p> <p>25 Q. Let's go to April.</p>
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<p>1 Q. So it looks like you're back in McKinney March</p> <p>2 6?</p> <p>3 A. Yup. Fixed assets auxiliary, so those are</p> <p>4 those behind the screens that you set up that nobody</p> <p>5 sees once you're on the system, so it's background</p> <p>6 set-up screens.</p> <p>7 Q. Relating to their fixed assets?</p> <p>8 A. Correct.</p> <p>9 Q. And what about the auxiliary?</p> <p>10 A. That's what it is. Let me think on fixed</p> <p>11 assets what we had to put in. I'm not coming up with</p> <p>12 it fast enough. Sorry.</p> <p>13 Q. That's okay. And the next day, March 7?</p> <p>14 A. Yeah. Accounts receivable and general billing</p> <p>15 and then miscellaneous cash, and that's all part of</p> <p>16 recording your cash as revenue into your system.</p> <p>17 Q. And is this training the customer?</p> <p>18 A. That's training.</p> <p>19 Q. What about the 8th?</p> <p>20 A. We did budgets, transfers, and amendments to</p> <p>21 budgets, so when you're moving money from one pot to</p> <p>22 another so to say, they have their rules for that, and</p> <p>23 then again that transfer and amendment, it's a journal</p> <p>24 entry.</p> <p>25 Q. What is your note right below that?</p>	<p>1 A. Uh-huh.</p> <p>2 Q. Is that McKinney on April 10?</p> <p>3 A. Uh-huh. Now we're actually going to enter</p> <p>4 accounts payable invoices and generate checks to pay</p> <p>5 invoices.</p> <p>6 Q. Is this now live data?</p> <p>7 A. No. This is still training. This is still</p> <p>8 training. Usually for us what I saw was it took six</p> <p>9 months to bring a client from building their chart of</p> <p>10 accounts, training their core users and then their end</p> <p>11 users, and getting them live. It was six months.</p> <p>12 Q. April 11.</p> <p>13 A. Uh-huh. Reqs to POs to AP to payment. So we</p> <p>14 entered a req, converted it to a PO. We actually paid</p> <p>15 against the purchase order, and then we made checks.</p> <p>16 Q. And this is still training of how to do</p> <p>17 those --</p> <p>18 A. Still training.</p> <p>19 Q. Let's just go real quick. It looks like April</p> <p>20 18 you're back at McKinney.</p> <p>21 A. Correct.</p> <p>22 Q. What about April 24? I'm not sure.</p> <p>23 A. Oh, that was McKinney documentation. McKinney</p> <p>24 wanted us to write user manuals, and that's what I did,</p> <p>25 so I wrote the user manual. It was a good one.</p>

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<p>1 Q. I bet it was. Was this something you created</p> <p>2 from scratch?</p> <p>3 A. Yes. So they hired us -- me to do the screen</p> <p>4 shots and step by step explain what the end user was</p> <p>5 going to do for his particular job with screen shots</p> <p>6 and one, two, three directions.</p> <p>7 Q. How big a manual was that?</p> <p>8 A. It was a full three-ring one-inch binder.</p> <p>9 McKinney was a big school.</p> <p>10 Q. I'm familiar with McKinney. I'm from Dallas.</p> <p>11 A. Oh.</p> <p>12 Q. So tell me: Was this the first time that you</p> <p>13 had created a user manual?</p> <p>14 A. Oh, no. I did it in my prior jobs at Smurfit</p> <p>15 and at Metro Parks. Let's see. So for a client to be</p> <p>16 hired to write a manual, that was the first time I did</p> <p>17 that for Munis, because most of the other client sites</p> <p>18 didn't have the personnel, didn't want to pay the</p> <p>19 money.</p> <p>20 McKinney had a consultant there, so Pete</p> <p>21 McKinney was the consultant, and he sat in all the</p> <p>22 training, and he helped the client decide how they were</p> <p>23 going to use the system.</p> <p>24 Q. When you say a consultant, was he someone</p> <p>25 with --</p>	<p>1 MS. PERLIONI: I think it's just in the</p> <p>2 copying.</p> <p>3 MS. BAGLEY: Oh, it's April, because</p> <p>4 June is up at the top in small --</p> <p>5 THE WITNESS: May, June, July. Where</p> <p>6 are we? Okay. May is the month.</p> <p>7 Q. (BY MS. PERLIONI) I'm just wondering what May</p> <p>8 24 to 25 means.</p> <p>9 A. Oh, that was that stress testing. That was</p> <p>10 what they called what we were doing with a client to</p> <p>11 test data in the system to make sure it worked</p> <p>12 properly, and then we did that in front of the client,</p> <p>13 and that was to be done before they Go Live.</p> <p>14 So it was an extra piece to ensure that they</p> <p>15 had seen the system work, they were okay with what they</p> <p>16 were seeing, and it just ensured, then, that they were</p> <p>17 getting it before they went live, and that was</p> <p>18 something new that they started doing, and that was</p> <p>19 another good thing to do before a client went live.</p> <p>20 Q. I'm looking at what I think to be June 12.</p> <p>21 A. Okay.</p> <p>22 Q. What is that?</p> <p>23 A. Oh, that was where I had to train the</p> <p>24 secretaries when I was there, so, again, they hired us</p> <p>25 to do their user training. Some of the sites wanted to</p>
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<p>1 A. He was someone hired totally different, not</p> <p>2 Munis. He was an outside consultant. Hillsboro,</p> <p>3 Oregon, also had an outside consultant. They could</p> <p>4 afford to do that.</p> <p>5 Q. So after you wrote this user manual for</p> <p>6 McKinney, did you utilize that with other customers?</p> <p>7 A. No.</p> <p>8 Q. It was exclusive for McKinney?</p> <p>9 A. It was special for McKinney and what they did.</p> <p>10 Q. Can you turn to it looks like it's the second</p> <p>11 side of June, June 24? What is that June 24 through</p> <p>12 June 25?</p> <p>13 A. Munis was down. Something happened back in</p> <p>14 Maine. They weren't available, so for some reason,</p> <p>15 Munis had a problem, and I couldn't get them for</p> <p>16 whatever reason I wanted to.</p> <p>17 MS. BAGLEY: Are we on the same page?</p> <p>18 THE WITNESS: June over on the side that</p> <p>19 looked like that. Munis was down.</p> <p>20 MS. BAGLEY: That's July.</p> <p>21 THE WITNESS: Oh, I'm sorry. No. Wait.</p> <p>22 This is June. Here's June, June.</p> <p>23 MS. BAGLEY: What does your June 24 say?</p> <p>24 MS. PERLIONI: Stress EOM.</p> <p>25 MS. BAGLEY: That's what mine says.</p>	<p>1 train their own people. Some of them were small. They</p> <p>2 just had the person there because that was the</p> <p>3 training. But McKinney was huge, so they hired us to</p> <p>4 come in and do the secretary training.</p> <p>5 Q. What kind of training -- what was your</p> <p>6 methodology for training the secretaries?</p> <p>7 A. It was pretty much the same thing all the way</p> <p>8 through, the same drill, open the screen up, explain --</p> <p>9 now, the thing with secretary training, that was going</p> <p>10 to be very limited because their piece of it was small,</p> <p>11 so they weren't going to see general ledger and they</p> <p>12 may see AR and they may see AP and they may see reqs,</p> <p>13 because that's their little piece of it, so they</p> <p>14 wouldn't see the general ledger, so that menu got</p> <p>15 narrowed down for them, and then to go through the</p> <p>16 steps in their work process with them, and that was</p> <p>17 using that manual.</p> <p>18 Q. The one that you created?</p> <p>19 A. Uh-huh.</p> <p>20 Q. And then what about the 19th?</p> <p>21 A. Yeah. Same thing again, more training the</p> <p>22 personnel -- Dena was one of them -- and working on</p> <p>23 that manual.</p> <p>24 Q. What about the 26th, 27th?</p> <p>25 A. Prelive. System administration. So that was</p>